

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street Dayton, Ohio 45402-2911 TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor Maureen O'Connor, Lt. Governor Christopher Jones, Director

November 25, 2003

Mr. William J. Taylor

U.S. Department of Energy, Fernald Area Office

P.O. Box 538705

Cincinnati, OH 45253-8705

Re: COMMENTS - Silo 3 Remedial Design/Remedial Action Package

Dear Mr. Taylor:

Ohio EPA has reviewed DOE's submittal, "Silo 3 Project Remedial Design/Remedial Action Package" received on October 6, 2003. Attached are our comments on the document.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider

Fernald Project Manager

Office of Federal Facilities Oversight

CC:

Jim Saric, U.S. EPA

Terry Hagen, FDF

Mark Shupe, HSI GeoTrans

Michelle Cullerton, Tetra Tech EM Inc.

Ruth Vandergrift, ODH

SILO 3 PROJECT REMEDIAL DESIGN/REMEDIAL ACTION PACKAGE

Revision 1 September 2003

General Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: na Pg #: na Line #: na Code: C

Original Comment #:

Comment: At the time of review of this document, the Silo 3 treatment facility construction is over 75% complete and procurement is 100% complete. Clearly any substantial design change recommended by Ohio EPA could/would not be considered at this time.

Response: Action:

2. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: na Pg #: na Line #: na Code: C

Original Comment #:

Comment: The document does not include a waste management/transportation plan.

Response:

Action:

3. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: na Pg #: na Line #: na Code: C

Original Comment #:

Comment: It appears that manual intervention will be utilized or may be needed during the operation of the Silo 3 project. Several times in document, DOE states that workers will be used to perform project-related tasks or in case of a malfunction. Ohio EPA is concerned that DOE is relying too much on human intervention in a radioactively contaminated environment.

Response:

Action:

4. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: na Pg #: na Line #: na Code: C

Original Comment #:

Comment: Please provide information regarding the excavator that has been selected.

Visual information in the form of photos or videos would be helpful.

Response:

Action: